

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH FRAPANPINA III on behalf of)	
Himself and all other similarly situated,)	
)	Case No. 19-cv-00493
Plaintiff,)	
)	
v.)	Judge John Robert Blakey
)	
GARDA CL GREAT LAKES, INC.,)	Magistrate Judge Michael T. Mason
)	
Defendant.)	

**JOINT MOTION TO EXTEND TIME TO FILE MOTION
FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

The parties, by their respective counsel, have previously reported that they have settled the case in principle. Pursuant to this Court's Order of September 16, 2021, the Court gave the Parties leave to file their Motion for Preliminary Approval of the Class Settlement on October 15, 2021. They now request that this Court give them 7 additional days to present their motion for preliminary approval: October 22, 2021. If the Court preliminarily approves the settlement, the parties will propose a schedule for sending notice, giving class members an opportunity to object or opt out and a hearing date for the Court to consider final approval and Class counsel's request for attorneys' fees.

Dated: October 12, 2021

Respectfully submitted,

GARDA CL GREAT LAKES, INC.

JOSEPH FRAPANPINA

By: /s/ Mark L. Shapiro

By: /s/ Terrence Buehler

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CERTIFICATE OF SERVICE

I, Terrence Buehler, the undersigned attorney, hereby certify that on October 12, 2021, I served the foregoing Joint Motion to Extend Time to File Motion for Preliminary Approval of Class Settlement via the Court's CM/ECF system, on all counsel of record.

/s/ Terrence Buehler